

Gaddis, P.C., and Co-Petitioner, Alyson Bell, by and through her attorneys Carol Glassman, Carol Glassman, P.C. and Nelissa Milfeld, Milfeld Law LLC, and hereby submit a Joint Expert Stipulation which reflects their agreement to retain the following joint experts to be engaged as follows:

1. Glenn Fleckenstein, Hammond Appraisals, 1890 Birch Street, Broomfield, CO 80020. 303-439-7447; glenn@hammondappraisals.com, as their joint expert to perform real estate appraisal and render an opinion of value for the property located at 7210 Timothy Place, Niwot, CO. This expert's C.V. and a list of his Expert Witness Testimony Experience are attached as Exhibit 1. Mr. Fleckenstein's appraisal will be provided to both counsel upon completion but no later than June 26, 2023.

To the extent that either party wishes to communicate with the appraiser about substantive issues relative to the property, communication should be by email with both parties and counsel copied in on the communication. Any substantive correspondence from a party or a representative of a party to an expert shall be forwarded to the other attorney upon receipt of the correspondence by that party's attorney or the expert.

2. Jeremy C. Harkness, CPA of Causey Demgen & Moore, 1099 Eighteenth Street, Suite 2300, Denver, CO 80202. (303) 296-2229 as their joint expert to perform a preliminary business evaluation for Tool Studios LLC to determine whether a full evaluation is indicated. After reviewing five years of business tax returns on January 25, 2022, Mr. Harkness advised counsel that a full business evaluation is indicated. The parties will retain Mr. Harkness to value the company. Mr. Harkness shall provide counsel with a draft report and solicit comments from both counsel before issuing final reports. Those comments will be provided to the expert in

written form, and copies of the comments shall be provided to opposing counsel. The parties shall attempt to resolve problems and/or deficiencies in the experts' reports during the "comment period" and prior to requesting third party experts to prepare rebuttal reports. Qualifications of this expert witness, including a list of all publications authored by the witness in the preceding ten years and any other cases in which the witness has testified as an expert in trial or by deposition within the last four years are attached as Exhibit 2. Mr. Harkness' report will be provided to both counsel upon completion but no later than June 26, 2023.

3. Prior to the issuance of the final reports, there shall be no *ex-parte* communications, including telephone communications, between the joint experts, the attorneys or the parties other than routine administrative or non-substantive communications. Prior to the issuance of the final reports, each attorney shall be copied on all correspondence to or from an expert and a party or his or her attorney.

4. In the event the expert determines they need to retain additional experts to assist with their engagements, the request shall be presented to counsel for a joint decision. Any disputes shall be resolved by the Court.

5. The experts shall inform both parties' counsel of items or documents they require to complete their report, which documents shall be provided as soon as practicable to the expert and the other lawyer. Any document provided by a party to an expert shall be forwarded to the other attorney so that both attorneys have a complete copy of all documents provided to the expert.

6. The parties have a duty to cooperate with and supply documents and other information requested by the experts.

7. Any retainer and/or fees required or incurred by their joint experts shall be paid from marital funds. Final allocation of expert fees is reserved for Permanent Orders or settlement.

Charles Bell

Jan 27, 2023


Alyson Bell (Jan 27, 2023 16:43 MST)

Jan 27, 2023

Charles Bell

Date

Allison Bell

Date

LYONS GADDIS, P.C.

CAROL GLASSMAN, P.C.

/s/ Erin Pierce

Erin Pierce, No. 52525

/s/ Carol Glassman

Carol Glassman, No. 11321










Joint Expert Stipulation - FINAL

Final Audit Report

2023-01-27

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